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INDUSTRIAL

Subject

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Time Critical Removal Action – Former Plainwell Impoundment
Monthly Report (June 2007)

Dear Sam:

Date

July 16, 2007

Attached is the fourth monthly progress report for the Allied Paper, Inc /Portage Creek/Kalamazoo River Superfund Site Time Critical Removal Action. This progress report is submitted in accordance with Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent for Removal Action (Docket No V-W-07-C-863).

Contact

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If you have any questions, please do not hesitate to contact me.

Email

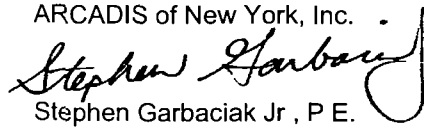
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Sincerely,

Our ref

B0064530.670

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Imagine the result

**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE
TIME CRITICAL REMOVAL ACTION (TCRA) – FORMER PLAINWELL IMPOUNDMENT**

REPORT #4, JUNE 2007

**PREPARED BY ARCADIS BBL
JULY 16, 2007**

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP

SUBMITTED TO

**SAMUEL BORRIES, ON-SCENE COORDINATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site TCRA**

REPORT #4, JUNE 2007

Significant Developments and Activities During the Period

- On June 1, the Kalamazoo River Study Group (KRSG) submitted to the United States Environmental Protection Agency (USEPA) a copy of a letter transmitted to the Michigan Department of Transportation (MDOT) in May requesting access to the Highway 131 right-of-way
- On June 4, the KRSG received a letter from the USEPA approving the *Multi-Area Quality Assurance Project Plan* (QAPP), as required by Paragraph 17d of the TCRA AOC.
- On June 4, the KRSG submitted a RCRA Subtitle C Site Identification Form to the Michigan Department of Environmental Quality (MDEQ) to apply for a Site EPA ID Number in order to dispose of waste materials generated during Time Critical Removal Action (TCRA) Activities.
- On June 5, the MDEQ assigned Site Identification Number MIK872785936 for the disposal of waste materials generated during TCRA Activities.
- On June 5, the USEPA issued a Press Release titled *Kalamazoo River Update. Plainwell Dredging Begins This Week.*
- On June 12, the KRSG contacted the USEPA and the MDEQ regarding the Kalamazoo River Aerial Photographs website.
- On June 15, the KRSG submitted the third *Monthly Report for the Allied Paper, Inc /Portage Creek/Kalamazoo River Superfund Site TCRA* for May 2007 to the USEPA.
- On June 15, the KRSG received an invitation from the USEPA to attend the Plainwell TCRA Open House/Question and Answer Session on June 27.
- On June 18, the MDEQ contacted the KRSG to request a site visit to the TCRA work areas on June 26
- On June 18, the KRSG transmitted TCRA photographs to the USEPA.
- On June 19, the KRSG submitted a final version of the *Traffic Control Plan* (TCP) to the USEPA
- On June 22, the MDEQ observed a soft sediment deposit outside the boundaries of the TCRA Work Area (Removal Area 1), and requested that the USEPA and the KRSG expand the scope of the TCRA to include excavation of this area.
- On June 22, the KRSG contacted the USEPA via telephone to discuss the MDEQ's request to expand the scope of the TCRA to include additional excavation areas near Removal Area 1.

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- On June 25, the KRSG, the USEPA, and the MDEQ participated in a conference call to discuss expanding the scope of the TCRA to include the additional excavation areas in Removal Area 1, as proposed by the MDEQ on June 22.
- On June 26, the USEPA informed the KRSG via telephone that the scope of the TCRA would not be expanded to include the additional excavation areas in Removal Area 1, as proposed by the MDEQ
- On June 26, the KRSG, the USEPA, and members of the MDEQ Surface Water Bureau toured the TCRA work areas
- On June 27, the KRSG attended the USEPA-hosted an Open House/Question and Answer Session in Plainwell.
- On June 29, the KRSG submitted a final version of the *Multi-Area QAPP* to the USEPA, as required by Paragraph 17d of the TCRA AOC
- On June 29, the KRSG and the USEPA exchanged analytical data for all samples collected as a part of TCRA activities to date.
- On June 29, the MDEQ informed the USEPA and the KRSG via telephone that sediment samples would be collected from an area of soft sediment observed outside the limits of Removal Area 1, as proposed by the MDEQ on June 22
- By June 30, the KRSG had obtained property access agreements, as required by Paragraph 23 of the TCRA AOC (Table A), from eight property owners

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Data Collected and Field Activities Conducted During the Period

- During the week of June 4, the KRSG continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, staking excavation limits, and installing site security measures) and began excavation in Removal Area 1 at the former Plainwell Impoundment. Ten-point grab samples of backfill (K25713) and topsoil (K25714) were collected. In addition, two sediment confirmation samples (K55231 and K55232) were collected from Removal Area 1, and two surface water samples were collected from locations 300 feet downstream and 100 feet upstream of Removal Area 1 for PCB analysis (K30608 and K30610, respectively). A duplicate of the downstream sample (K30609) and a rinse blank (K30611) were also collected. Table B summarizes the samples collected. Solidification of the excavated material began at Staging Area 1N using a pug mill with cement.
- During the week of June 11, the KRSG continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, staking excavation limits, and installing site security measures), began to establish a project support office at the Aggregate Industries property on 12th Street, and continued excavation in Removal Area 1 at the former Plainwell Impoundment. Five sediment confirmation samples (K55233 through K55237) were collected from Removal Area 1 for PCB analysis. Two surface water samples were collected from locations 300 feet downstream and 100 feet upstream of Removal Area 1 for PCB analysis (K30612 and K30613, respectively). A rinse blank (K30614) was also collected. Table B summarizes the samples collected. Solidification of the excavated material continued at Staging Area 1N using a pug mill with cement, and solidified material from the pug mill was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan for disposal.
- During the week of June 18, the KRSG continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, staking excavation limits, and installing site security measures), continued to establish a project support office at the Aggregate Industries property on 12th Street, and continued excavation in Removal Area 1 at the former Plainwell Impoundment, including the excavation of an additional six inches of sediment from Removal Area 1, Grid 5. Five sediment confirmation samples (K55238 through K55242) and one duplicate sample (K55243) were collected from Removal Area 1 for PCB analysis. Two surface water samples were collected from locations 300 feet downstream and 100 feet upstream of Removal Area 1 for PCB analysis (K30615 and K30616, respectively). A rinse blank (K30617) was also collected. Table B summarizes the samples collected. Solidification of the excavated material continued at Staging Area 1N using a pug mill with cement, and solidified material from the pug mill was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan for disposal.
- During the week of June 25, the KRSG continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, staking excavation limits, and installing site security measures), continued to establish a project support office at the Aggregate Industries property on 12th Street, continued excavation in Removal Area 1, and began excavation in Removal Area 2A at the former Plainwell Impoundment. An additional six inches of sediment was excavated from Removal

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Area 1, Grid 12. Four sediment confirmation samples (K55244 through K55247) were collected from Removal Areas 1 and 2A for PCB analysis. The USEPA collected a split sample from samples K55244 and K55245. Two surface water samples were collected from locations 300 feet downstream and 100 feet upstream of Removal Area 1 for PCB analysis (K30618 and K30619, respectively). A rinse blank (K30620) was also collected. Table B summarizes the samples collected. Solidification of the excavated material continued at Staging Area 1N using a pug mill with cement, and the solidified material from the pug mill was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) or Wayne Landfill in Belleville, Michigan (TSCA material) for disposal.

Laboratory Data Received During the Period

- During the week of June 4, the KRSG did not receive any laboratory data.
- During the week of June 11, the KRSG received laboratory data for four concrete samples collected for use as potential aggregate material (Samples K25709 through K25712), and PCB analytical results for sediment confirmation samples K55231 through K55237 and surface water samples K30612 through K30614 (Table B).
- During the week of June 18, the KRSG received laboratory data for the soil and backfill samples (K25713 and K25714) and PCB analytical results for sediment confirmation samples K55238 through K55241 (Table B).
- During the week of June 25, the KRSG received PCB analytical results for sediment confirmation samples K55242 through K55257 and surface water samples K30608 through K30611 (Table B).
- During the week of June 25, the KRSG received PCB analytical results for the two sediment confirmation samples (K55244 and K55245) collected by the USEPA.
- The KRSG is awaiting analytical results for surface water samples K30615 through K30620.

Issues Encountered and Actions Taken

- On June 7, after excavating the targeted two feet of material from the easternmost portion of Removal Area 1, onsite personnel observed paper-making residuals (residuals) present within the excavation. Onsite and regulatory personnel discussed whether to excavate an additional six inches of material, or to develop a confirmation sampling scheme for the area in its present condition. Sample K55231 was collected from the area in its present condition.
- On June 8, river water was observed moving into the area surrounded by the silt fence installed near Removal Area 1. Water from the area was not observed to be entering the river. The silt fence was quickly repaired and turbidity readings did not reach the action limit.

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- On June 8, unauthorized individuals were found in the 12th Street Plainwell Dam area. Site personnel immediately directed these unauthorized individuals to the site trailer and warned them of safety concerns and of unauthorized entry. The unauthorized individuals did not proceed to the trailer, but instead left a business card reading "Kalamazoo River Cleanup Coalition" and departed the premises. Appropriate KRSG, USEPA and law enforcement personnel were notified. On June 11, in response to the June 8 incident, the KRSG contacted the USEPA via telephone regarding the proper procedure for reporting and preventing trespassing in the TCRA Work Areas.
- On June 12, the USEPA contractor, the MDEQ and the MDEQ's contractor questioned the confirmation sampling technique of collecting a six-inch sample of sediment, discarding the first three inches of material, and submitting the three- to six-inch interval for laboratory analysis. No decision regarding sampling techniques was made at that time. It was agreed that Sam Borries of the USEPA would be contacted, and the matter would be further discussed. Sam Borries later confirmed that no changes to the sampling technique would be necessary.
- On June 12, confirmation sample K55235 was collected from Removal Area 1, Grid 5. According to laboratory results, the PCB concentration of sample K55235 was 6.4 mg/kg, which exceeded the performance standard of 4 mg/kg. As such, an additional six inches of material had to be excavated from this area, as described below.
- On June 18, an additional six inches of material was excavated from Removal Area 1, Grid 5 in response to a PCB concentration of 6.4 mg/kg detected in the original confirmation sample (K55235). After these additional six inches of material was removed, another sample (K55238) was collected. The PCB concentration detected in sample K55238 (2.3 mg/kg) did not exceed the performance standard of 4 mg/kg. The USEPA approved the completion of excavation in this area.
- On June 21, crews working at Staging Area 1N punctured the top layer of the non-woven geomembrane liner, and work at the pugmill was suspended. On June 22, a crew from American Environmental Group, Ltd. (AEG) removed geotextile fabric liner from above and below the punctured geomembrane liner. The bottom layer of geotextile fabric was replaced, an approximately 5.5-foot diameter patch of geomembrane liner was welded into place above the hole, and the top layer of geotextile fabric was replaced. A successful vacuum test of the weld was performed before replacing the top layer of geotextile fabric. Pugmill activities resumed after the repair was completed.
- On June 23, one soil sample (K55242) and one MS/MSD duplicate sample (K55243) were collected from Removal Area 1, Grid 11. According to the analytical results, the total PCB concentrations in the sample and in the duplicate were 1.1 mg/kg and 4.4 mg/kg, respectively. Since the latter concentration exceeded the performance standard 4 mg/kg, both samples were reanalyzed to resolve the discrepancy. According to the reanalysis, the sample and duplicate PCB concentrations were 2.4 mg/kg and 1.7 mg/kg, respectively. These results were reported to the USEPA On-Scene Coordinator (OSC), who concluded that excavation in the area was complete.

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- On June 25, a visible silt plume was observed outside of the silt curtains in Removal Area 1. Work was immediately suspended, the silt curtain was repaired, and excavation commenced later that day. No elevated turbidity readings were recorded.
- On June 26, the USEPA split sample K55244 with the KRSG. The split sample was collected from Removal Area 1, Grid 12, a TSCA material area. Although the PCB concentration detected in the KRSG sample (2.7 mg/kg) was below the performance standard of 4 mg/kg, the PCB concentration detected in the USEPA split sample (4.9 mg/kg) exceeded the performance standard. Onsite construction personnel determined that it was more time and cost effective to excavate an additional 6 inches of material from the area than to reanalyze the sample(s). The additional excavation took place on June 29 (see below).
- On June 27, the City of Plainwell informed the KRSG that the area cleared on the City of Plainwell's property for the installation of an access road was not acceptable, and that the access road had to be relocated. The KRSG surveyed, cleared and grubbed the area for the new access road on June 28 and June 29.
- On June 27, a representative of the MDEQ observed water flowing under the silt curtain near the upstream portion of Removal Area 2A. The curtain was repaired on June 28 prior to the start of any removal activities in the area.
- On June 29, an additional 6 inches of material was excavated from Removal Area 1, Grid 12, in response to the June 26 USEPA analysis of split sample K55244. After the excavation was complete, the KRSG attempted to collect a confirmation sample. However, all Lexan[®] tubes were driven to refusal and no material could be collected from any of the five nodes. As such, no sample was collected. The USEPA determined that the excavation in this area was complete, and that no additional excavation or sampling would be required.
- On June 29, the MDEQ informed the USEPA and the KRSG of their intention to collect sediment samples from an area of soft sediments located outside Removal Area 1. The USEPA had previously informed the MDEQ that this area was not in the original scope of the TCRA, and that the scope of work would not be modified to include this area in the river.

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Developments Anticipated During the Next Reporting Period

- During the week of July 2, the KRSG is scheduled to complete the backfilling of Removal Area 1, remove the silt curtain around Removal Area 1, continue the excavation of Removal Area 2A, and receive a shipment of steel sheeting for the water control structure.
- During the week of July 9, the KRSG plans to host a Monthly Stakeholders Meeting and to complete the excavation of Removal Area 2A
- During the week of July 16, the KRSG is scheduled to begin excavation of Removal Area 3A.
- During the week of July 23, the KRSG is scheduled to begin construction of Staging Area 2S, complete the excavation of Removal Area 3A, begin excavation of Removal Area 4A, and complete the restoration of Removal Area 1
- During the week of July 30, the KRSG is scheduled to complete the restoration of Removal Area 2S.
- Throughout July, the KRSG will continue to negotiate property access agreements as required by Paragraph 23 of the TCRA AOC (Table A).
- Throughout July, the KRSG will, as necessary, continue to submit Subcontractor Qualification Notifications to the USEPA, as required by Paragraph 11 of the TCRA AOC.

**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Former Plainwell Impoundment TCRA
Monthly Report #4, June 2007**

Table A — Summary of Property Access Agreements (as of June 30, 2007)

Date Sent	Property Owner	Status
3/19/2007	A.C. Geenen Associates	no response
3/9/2007	Aggregate Industries (Bill Smith Sand and Gravel)	accepted
3/9/2007	Allen Robinson	accepted
3/9/2007	Balkema Excavating	accepted
3/9/2007	Brad Keeler	accepted
3/9/2007	City of Plainwell	accepted
3/26/2006	Consumers Energy	in negotiations
3/9/2007	Meijer, Inc.	in negotiations
3/21/2007	Plainwell Group LLC	no response
3/16/2007	Robert Foster Trust	rejected
3/9/2007	Robert Keeler Trust	accepted
3/9/2007	Rolfe Family Trust	accepted
3/16/2007	Shirley Foster	no response
3/9/2007	Steven Peterson	accepted

**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
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Table B — Summary of Samples Collected and Data Received in June 2007

Sample ID	Sample Date	Data Received	Sample Matrix	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
K25709	05/31/07	06/14/07	Concrete	Offsite Location	TPH, total PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL pesticides	<0.270	4	None, no constituents exceeded action limits
K25710	05/31/07	06/14/07	Concrete	Offsite Location	TPH, total PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL pesticides	<0.270	4	None, no constituents exceeded action limits
K25711	05/31/07	06/14/07	Concrete	Offsite Location	TPH, total PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL pesticides	<0.270	4	None, no constituents exceeded action limits
K25712	05/31/07	06/14/07	Concrete	Offsite Location	TPH, total PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL pesticides	<0.055	4	None, no constituents exceeded action limits
K25713	06/08/07	06/21/07	Backfill	Offsite Location	TPH, total PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, TCL pesticides, organic content, pH, grain size, and gradation	<0.050	4	None, no constituents exceeded action limits
K25714	06/08/07	06/21/07	Topsoil	Offsite Location	TPH, total PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, TCL pesticides, organic content, pH, grain size, and gradation	<0.057	4	None, no constituents exceeded action limits
K55231	06/08/07	06/12/07	Sediment	RA 1, Grid 1	PCBs	2.9	4	None
K55232	06/08/07	06/12/07	Sediment	RA 1, Grid 2	PCBs	1.0	4	None
K55233	06/11/07	06/13/07	Sediment	RA 1, Grid 3	PCBs	<0.330	4	None
K55234	06/12/07	06/14/07	Sediment	RA 1, Grid 4	PCBs	0.34	4	None
K55235	06/12/07	06/14/07	Sediment	RA 1, Grid 5	PCBs	6.4	4	Removed an additional 6" of material on 6/18/07
K55236	06/12/07	06/14/07	Sediment	RA 1, Grid 6	PCBs	2.3	4	None
K55237	06/14/07	06/15/07	Sediment	RA 1, Grid 7	PCBs	0.34	4	None
K55238	06/18/07	06/19/07	Sediment	RA 1, Grid 5	PCBs	2.3	4	Resample of RA 1, Grid 5 after additional excavation
K55239	06/19/07	06/20/07	Sediment	RA 1, Grid 8	PCBs	0.34	4	None
K55240	06/19/07	06/20/07	Sediment	RA 1, Grid 9	PCBs	<0.330	4	None
K55241	06/19/07	06/20/07	Sediment	RA 1, Grid 10	PCBs	0.7	4	None

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Table B — Summary of Samples Collected and Data Received in June 2007

Sample ID	Sample Date	Data Received	Sample Matrix	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
K55242	06/23/07	06/26/07	Sediment	RA 1, Grid 11	PCBs	11 / 24	4	Duplicate sample concentration exceeds action limit, reanalyze both samples
[K55243]						[44 / 17]		
K55244 ¹	06/26/07	06/27/07	TSCA Sediment	RA 1, Grid 12	PCBs	27	4	Removed an additional 6" of material on 6/29/07 ²
[K55244]						[4.9]		
K55245 ¹	06/27/07	06/28/07	TSCA Sediment	RA 2A, Grid 4	PCBs	<0.330	4	None
[K55245]						[<0.39]		
K55246	06/27/07	06/28/07	TSCA Sediment	RA 2A, Grid 3	PCBs	<0.330	4	None
K55247	06/28/07	06/29/07	TSCA Sediment	RA 2A, Grid 5	PCBs	<0.330	4	None
K30608	06/08/07	06/25/07	Surface Water Sample	300' downstream of RA 1	PCBs	<0.0001	2e-4 mg/L	None
[K30609]						<0.0001		
K30610	06/08/07	06/25/07	Surface Water Sample	100' upstream of RA 1	PCBs	<0.0001	2e-4 mg/L	None
K30611	06/08/07	06/25/07	Rinse Blank	-	PCBs	<0.0001	2e-4 mg/L	None
K30612	06/14/07	06/15/07	Surface Water Sample	300' downstream of RA 1	PCBs	<0.0001	2e-4 mg/L	None
K30613	06/14/07	06/15/07	Surface Water Sample	100' upstream of RA 1	PCBs	<0.0001	2e-4 mg/L	None
K30614	06/14/07	06/15/07	Rinse Blank	-	PCBs	<0.0001	2e-4 mg/L	None
K30615	06/21/07	NR	Surface Water Sample	300' downstream of RA 1	PCBs	NR	2e-4 mg/L	-
K30616	06/21/07	NR	Surface Water Sample	100' upstream of RA 1	PCBs	NR	2e-4 mg/L	-
K30617	06/21/07	NR	Rinse Blank	-	PCBs	NR	2e-4 mg/L	-
K30618	06/28/07	NR	Surface Water Sample	300' downstream of RA 1	PCBs	NR	2e-4 mg/L	-
K30619	06/28/07	NR	Surface Water Sample	100' upstream of RA 1	PCBs	NR	2e-4 mg/L	-
K30620	06/28/07	NR	Rinse Blank	-	PCBs	NR	2e-4 mg/L	-

Notes:

1 - Split sample collected by USEPA

2 - The PCB concentration detected in the USEPA split sample exceeded 4 mg/kg. As such, an additional 6" of material was excavated from this area. No material could be collected at the completion of this excavation, so no confirmation sample was submitted to the laboratory for analysis.

NR - Analytical results not yet received

RA - Removal Area

* Duplicate samples are shown in brackets

* EPA split samples are shown in bold and in brackets